

Exhibit B

(Declaration of Conor Tully)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

SL LIQUIDATION, *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10207 (TMH)
(Jointly Administered)

**DECLARATION OF CONOR TULLY IN SUPPORT OF FIRST OMNIBUS CLAIM
OBJECTION (NON-SUBSTANTIVE) OF THE COMMITTEE TO CERTAIN
CONVENIENCE CLASS CLAIMS THAT ARE (I) DUPLICATIVE CLAIMS, (II) LATE
FILED CLAIMS AND (III) NO LIABILITY CLAIMS**

Pursuant to 28 U.S.C. § 1746, I, Conor Tully, submit this declaration (the “Declaration”) under penalty of perjury and state that the following is true to the best of my knowledge, information, and belief:

1. I am a Senior Managing Director with FTI Consulting, Inc., together with its wholly owned subsidiaries (“FTI”). On April 19, 2023, this Court entered an *Order Authorizing Retention of FTI Consulting, Inc. as Financial Advisor for the Official Committee of Unsecured Creditors Nunc Pro Tunc to March 9, 2023* [Docket No. 217].

2. I submit this Declaration in support of the *First Omnibus Claim Objection (Non-Substantive) of the Committee to Certain Convenience Class Claims That Are (I) Duplicative Claims, (II) Late Filed Claims and (III) No Liability Claims* (the “First Omnibus Objection”);² and state that the information contained in such First Omnibus Objection and the exhibits thereto

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: SL Liquidation LLC (0378); TPP Liquidation, Inc. (5202); HTPPS Liquidation, Inc. (2594); and HGTPPS Liquidation, Inc. (1734). The Debtors’ service address for purposes of these chapter 11 cases is PMB #179, 1159 Second Avenue, New York, NY 10065.

² Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the First Omnibus Objection.

is true and correct to the best of my knowledge and belief and based on the information and records available to me.

3. The proofs of claim are recorded on the official claims register (the “Claims Register”) maintained by Kurtzman Carson Consultants LLC, the claims and noticing agent retained by the Debtors to assist with claims processing in the Chapter 11 Cases.

4. As of the General Bar Date, proof of claim numbers 1 – 412 had been filed in these Chapter 11 Cases. As of the date of this First Omnibus Objection, proof of claim numbers 1 - 478 were filed in these Chapter 11 Cases.

5. The Committee’s professionals have been reviewing and analyzing the Debtors' books and records (the “Books and Records”), the Claim Register, and the individual proofs of claim to determine the validity of the proofs of claim.

6. I assisted in the preparation of the First Omnibus Objection. Through my review or with the assistance of employees and professionals under my direction, I am personally and generally familiar with, *inter alia*, the Debtors’ liabilities and amounts owed to their creditors. I am also generally familiar with the register of claims prepared and provided by the noticing and claims agent in these Chapter 11 Cases, Kurtzman Carson Consultants LLC.

7. I have reviewed the First Omnibus Objection, including the information set forth on Schedules 1, 2 and 3 to the Proposed Order, and I am familiar with the information contained in those documents.

8. I believe the Duplicate Claims and Late Filed Claims identified on Schedules 1 and 2 to the Proposed Order should be disallowed as is further set forth in the First Omnibus Objection.

9. To the best of my knowledge and belief, and based on the information and records available to me, each No Liability Claim identified on Schedule 3 to the Proposed Order should

be expunged and disallowed in their entirety. After reconciling each of the No Liability Claims against the Debtors' Books and Records, it has been determined that there is no basis for any liability related to the No Liability Claims.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best my knowledge, and belief.

Dated: November 29, 2023

By: /s/ *Conor Tully*
Conor Tully